

February 16, 2016

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VIA E-MAIL AND/OR CERTIFIED MAIL

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RE: *United States, et al. v. Coffeyville Resources Refining & Marketing, LLC*, Case No. 6:04-CV-01064-KMH ("Second Consent Decree")

Dear Recipients:

Pursuant to Paragraph 19.1.b of the proposed modification to the Second Consent Decree, Coffeyville Resources Refining & Marketing ("CRRM") is notifying EPA that the lowest achievable SO₂ emissions rate while adding SO₂ Reducing Catalyst Additive with a reasonable certainty of compliance and without interfering with FCCU conversion or processing rate is 25.00 ppmvd @ 0% O₂. The attached SO₂ emissions data from January 2016 indicates that CRRM achieved an average SO₂ emissions rate of 28.66 ppmvd @ 0% O₂.

During January 2016, CRRM was adding an average 1179 pounds per day of SO₂ reducing catalyst additives in order to meet its permitted SO₂ limit. CRRM was also trying two

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different additives as part of its additive optimization trial. In addition, CRRM has not yet begun its O₂ enrichment project, which is expected to reduce SO₂. For these reasons and based on the data available to date, CRRM has concluded that 25.00 ppmvd @ 0% O₂ is the lowest emission rate it can achieve.

This notice is timely submitted in accordance with Liz Loeb's February 9, 2016 email granting the company's request for a short extension of time in light of the company's confusion about the applicability of the deadlines before the Consent Decree was lodged and entered.

Please let me know if you need any additional information or have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read 'LeAnn Johnson Koch', with a stylized, cursive script.

LeAnn Johnson Koch

Attachment

cc: Elizabeth Loeb, Esq. (via electronic mail w/attachment)
Javier Ahumada (via electronic mail w/attachment)
John Walter, Esq. (via electronic mail with attachment)
Mr. Darin Rains (via electronic mail with attachment)
Ms. Janice DeVelasco, P.E. (via electronic mail w/attachment)
Mr. Robert Morris (via electronic mail w/attachment)
Mr. John Ditmore (via electronic mail w/attachment)

	35A171C.PV 35A171C.PV		SO2 DAILY AVG	35A171A.PV 35A171A.PV		DAILY AVG	35A101.PV 35A101.PV		O2 DAILY AVG	ADDITIVE DAILY AVG	35W1301B.PV 35W1301B.PV		35W1301C.PV 35W1301C.PV		CATLOAD.C_LBS CATLOAD.C_LBS	
	PPM	ENVIRONMENTAL		PPM	REGEN FLUE GAS SO2		PERCENT	OXYGEN REGEN FLUE GAS			LB	INTERCAT COMP B CURRENT WEIGHT	LB	INTERCAT COMP C CURRENT WEIGHT	LB	DESOX ACTUAL LBS
12/31/2015 23:00	21.31		20.54	18.07		21.83	2.22		2.24	1200.00			3100.00			1144.06
1/1/2016 18:00	1.67		13.53	1.34		12.62	2.42		2.27	1089.00			2280.00			893.24
1/2/2016 23:00	21.27		21.40	17.68		18.47	2.51		2.45	1199.00			20183.00			1132.02
1/3/2016 23:00	16.04		16.38	13.22		14.58	2.44		2.56	1101.00			18560.00			1060.93
1/4/2016 23:00	3.59		27.17	3.03		24.17	2.19		2.10	960.00			1421.00			606.77
1/5/2016 23:00	28.52		23.85	23.68		21.10	2.41		2.23	968.00		0.00	1287.00			
1/6/2016 23:00	23.27		27.20	19.08		23.22	2.58		2.45	968.00		831.00	1145.00			
1/7/2016 23:00	63.14		48.97	53.08		41.91	2.33		2.38	964.00		31.48	998.26			
1/8/2016 23:00	72.84		72.00	61.43		61.52	2.27		2.22	898.00		1799.00	863.00			
1/9/2016 23:00	48.09		64.39	40.18		54.45	2.37		2.30	1011.00		929.90	718.00			
1/10/2016 23:00	63.69		53.83	53.34		46.03	2.25		2.25	1074.00		1756.64	584.00			
1/11/2016 23:00	61.53		62.11	51.08		53.02	2.40		2.29	1074.00		628.75	409.00			
1/12/2016 23:00	47.92		55.24	40.69		47.08	2.11		2.28	1407.00		1024.18	300.00			
1/13/2016 23:00	52.01		34.55	44.31		30.33	2.12		2.16	1409.00		1726.73	2160.00			
1/14/2016 23:00	13.85		53.22	11.47		46.54	2.57		2.08	1500.00		229.81	2019.00			
1/15/2016 23:00	23.29		24.37	19.31		21.11	2.50		2.45	1420.00		754.86	1883.00			
1/16/2016 23:00	35.13		28.69	29.78		24.92	2.17		2.32	1419.00		1211.00	1730.00			
1/17/2016 23:00	48.53		26.31	40.96		22.96	2.14		2.23	1222.00		-48.00	1585.00			
1/18/2016 20:00	75.01		36.96	64.38		32.01	2.05		2.18	1415.00		810.41	1472.98			
1/19/2016 23:00	18.08		18.13	14.88		15.06	2.53		2.45	1362.00		1333.58	1324.00			
1/20/2016 23:00	41.74		31.73	35.45		27.78	2.14		2.29	1241.00		13.28	1198.00			
1/21/2016 23:00	6.42		19.79	5.12		17.84	2.85		2.56	1255.00		730.66	1018.00			
1/22/2016 23:00	1.13		2.40	0.90		2.98	2.62		2.77	963.00		1679.00	976.00			
1/23/2016 23:00	1.06		1.10	0.86		1.74	2.74		2.72	969.00		724.50	931.00			
1/24/2016 00:00										741.00						
1/25/2016 23:00	5.18		1.84	4.34		2.50	2.28		2.40	957.00		997.00	800.00			
1/26/2016 23:00	42.90		22.98	36.07		20.52	2.29		2.29	1218.00		1853.60	677.25			
1/27/2016 23:00	30.18		43.55	25.09		37.92	2.42		2.26	1412.00		390.13	542.00			
1/28/2016 23:00	2.64		17.78	2.16		15.70	2.59		2.51	1414.00		1094.92	418.00			
1/29/2016 23:00	6.19		9.62	5.14		8.82	2.54		2.50	1402.00		1689.98	179.00			
1/30/2016 23:00	3.99		3.91	3.34		4.27	2.43		2.48	1313.00		417.00	56.00			
1/31/2016 23:00	4.33		4.97	3.62		5.15	2.42		2.42			937.91	1907.53			
Daily avg			28.66			25.10			2.36	1178.87						
Hourly Average	28.90			25.31			2.36					930.50		2605.33		532.11